



**FREUND FREEZE & ARNOLD**  
A LEGAL PROFESSIONAL ASSOCIATION

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November 16, 2004

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE: Rowena Ann Reno v. Michael Turner, et al.  
MUR #5591

Dear Sir/Madam:

This will advise that I represent Congressman Michael Turner in connection with the captioned complaint filed before the Federal Election Commission.

I enclose herewith the following for filing:

- 1) Statement of Designation of Counsel;
- 2) Motion for an Extension of Time; and
- 3) Motion for a More Definite Statement.

Please return time-stamped copies in the enclosed, self-addressed stamped envelope.

Thank you.

Very truly yours,

FREUND, FREEZE & ARNOLD

*Neil F. Freund/aff.*  
Neil F. Freund

NFF/cka  
Enclosures

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2004 NOV 22 P 3:57

26044151326



FEDERAL ELECTION COMMISSION  
999 E Street, NW  
Washington, DC 20463

**Statement of Designation of Counsel  
(Respondent/Witness)**

Name of Counsel Neil F. Freund

Firm Freund, Freeze & Arnold

1 South Main Street, Suite 1800, Dayton, OH 45402-2017

Telephone: ( 937 ) 222-2424

Fax: ( 937 ) 222-5369

The above named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/15/04  
Date

Michael A. Turner  
Signature

Name (Print) Michael Turner

Address Dayton, OH 45402

Telephone: Home (        )

Business ( 937 ) 222-7749

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

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COUNSEL  
2004 NOV 22 P 3:51 PM

26044151327

BEFORE THE FEDERAL ELECTION COMMISSION

ROWENA ANN RENO

Complainant

vs.

MICHAEL TURNER AND  
TURNER FOR CONGRESS

Respondents

\* MUR NO. 5591


\* MOTION FOR EXTENSION  
OF TIME

\*

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COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2004 NOV 22 P 3:52

Now comes the Respondent, through counsel, and hereby requests additional time within which to respond to the Complaint of the Complainant.

Respondent requests an additional sixty (60) days within which to respond to the Complaint.



\_\_\_\_\_  
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Attorney for Respondents

MEMORANDUM

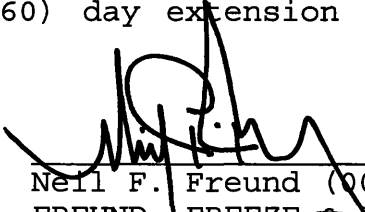
Respondent and the undersigned first had an opportunity to meet and discuss this matter on November 15, 2004. Initially, Respondent was involved in the election process and thereafter took a vacation.

Congressman Turner is now back in Washington performing his duties and the undersigned is in the process of preparing for a lengthy trial which is expected to go into the Christmas holidays.

Furthermore, the Complaint seems to discuss events that occurred in the calendar year of 2002. Therefore, it will take time to thoroughly investigate.

Finally, the undersigned is filing a motion requesting a more definite statement as to exactly what rule or regulation Respondent allegedly violated.

Therefore, it is respectfully requested that Respondent be granted an additional sixty (60) day extension within which to respond or otherwise plead.



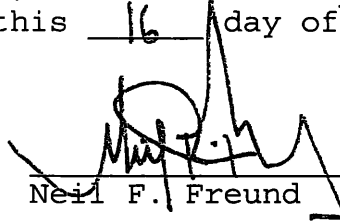
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[adetmer@ffalaw.com](mailto:adetmer@ffalaw.com)  
Attorney for Respondents

26044151329

PROOF OF SERVICE

This will certify that a copy of the foregoing was mailed by ordinary mail to complainant, Rowena Ann Reno Sabina, OH 45169, this 16 day of November, 2004.

  
Neil F. Freund

2604151330

BEFORE THE FEDERAL ELECTION COMMISSION

ROWENA ANN RENO

Complainant

vs.

MICHAEL TURNER AND  
TURNER FOR CONGRESS

Respondents

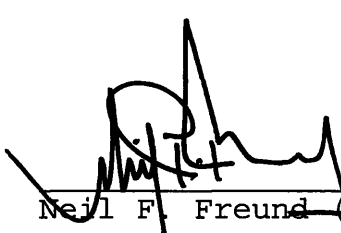
\* MUR NO. 5591

\* MOTION FOR A MORE  
DEFINITE STATEMENT

\*

Now comes Respondent, through counsel, and hereby requests the Commission to order Complainant to specifically identify the rule, regulation or statute that Respondent allegedly violated.

This motion is supported more fully by the Memorandum set forth below.



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Attorney for Respondents

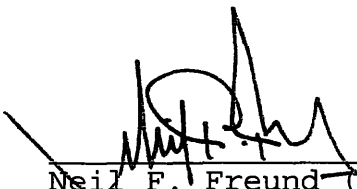
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COUNSEL

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MEMORANDUM

Complainant has made several allegations against Respondent claiming violations of unknown rules, regulations, codes, or statutes by the Respondent. Respondent is entitled to know exactly what rule, regulation, code, or statute he allegedly violated and the date and/or dates the violations occurred.

Without this information, Respondent cannot adequately investigate the allegations of the Complainant and appropriately respond.

  
\_\_\_\_\_  
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Attorney for Respondents

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Neil F. Freund